

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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In Re:

Hermia Mazie Henderson,

Debtor.

Case No. 17-25541-SLM

Chapter: 13

Judge: SLM

**STATEMENT AS TO WHY NO BRIEF IS NECESSARY
IN ACCORDANCE WITH 'LOCAL RULES OF THE UNITED STATES BANKRUPTCY
COURT DISTRICT OF NEW JERSEY' RULE 9013-1**

The within Motion to Cancel and Discharge Lien requests avoidance of a lien held by Financial Pacific Leasing Inc. under the Chapter 13 Plan in accordance with 11 U.S.C. §522(f) (lien impairs exemption) on the grounds as set forth on the accompanying Certification, the Debtor has successfully completed the Chapter 13 Plan which provided for a discharge and cancellation of record of the lien referenced herein.

As the facts the Petitioner relies upon, as set forth on the accompanying Certification, and the basis for discharge and cancellation of record of the lien do not present complicated questions of fact or unique questions of law and it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion to Cancel and Discharge Lien.

Dated: September 21, 2022

/s/Timothy P. Kane
TIMOTHY P. KANE, ESQ.